

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WISCONSIN

IN RE
Brian George Lavicka and Kandi Lyn Lavicka
Debtors.

Chapter: 13
Case No. 15-10014-cjf

**STIPULATION REGARDING MOTION OF WELLS FARGO BANK, N.A. FOR RELIEF FROM
THE AUTOMATIC STAY**

The debtors, by the attorneys at, Buss Legal Group, S.C., and Wells Fargo Bank, N.A., its successors and/or assignees (hereinafter 'the movant'), by its attorneys, Gray & Associates, L.L.P., stipulate and agree as follows:

1. The movant holds a promissory note and a mortgage encumbering the debtors' real property located at 516 Elm St Athens, WI 54411-9761. The debtors have failed to make monthly mortgage payments required by said note and mortgage in a timely manner. Said default in payments has caused the movant to file a motion for relief from the automatic stay herein dated August 4, 2015. The arrearage is itemized as follows:

4/1/15 through 8/1/15	\$3,042.60
5 mortgage payments @ \$608.52	
Credits / Suspense	(582.56)
Payment received 8/20/2015	<u>(2,460.04)</u>
TOTAL ARREARAGE	<u>\$0.00</u>

Drafted by:

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Gray & Associates, L.L.P. is attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

2. That commencing in September 2015 through and including February 2016, the debtors shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, counsel for the movant may submit an affidavit of default and proposed order for immediate relief from the automatic stay to the court for signature.

3. That commencing in March 2016, the debtors shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, counsel for the movant may request by letter another hearing upon the motion for relief from the automatic stay.

4. That pending further notice, the amount of the monthly mortgage payment is \$608.52 and payments shall be made to the movant at Wells Fargo Bank, N.A., 1 Home Campus, Attention: Payment Processing, MAC# x2302-04c, Des Moines, IA 50328.

5. That the court approve the terms of this stipulation and make them an order of the court.

Dated this 15th day of September, 2015

Dated this 27th day of August, 2015

Buss Legal Group, S.C.
Attorneys for Debtors

Gray & Associates, L.L.P.
Attorneys for Movant

By: /s/ Todd C. Buss
Todd C. Buss

By: /s/ Christopher C. Drout
Christopher C. Drout

NO OBJECTION

Dated this 31st day of August, 2015

/s/ Leslie Brodhead Griffith, atty
For Mark Harring
Chapter 13 Trustee